

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE: <u>Damon A. Wilkins</u>	:	Chapter 13
	:	
Debtor	:	
	:	
	:	Bankruptcy No.: <u>21-12336\mdc</u>

**DEBTOR'S ANSWER TO MOTION FOR
RELIEF FROM AUTOMATIC STAY**

1. After reasonable investigation, Respondent is without knowledge, information or belief sufficient to form a belief as to the truth of the averment of this paragraph and therefore is deemed denied.
2. The averments of this paragraph refer to written instrument that speaks for itself and are therefore, deemed denied
3. After reasonable investigation, Respondent is without knowledge, information or belief sufficient to form a belief as to the truth of the averment of this paragraph and therefore is deemed denied. By way of further response, the averments of this paragraph refer to written instrument that speaks for itself and are therefore, deemed denied.
4. Admitted.
5. The averments of this paragraph are conclusions of law to which a responsive pleading is not required under the rules of procedure and therefore deemed denied.
- 6.-8. After reasonable investigation, Respondent is without knowledge, information or belief sufficient to form a belief as to the truth of the averment of this paragraph and therefore is deemed denied.
9. The averments of this paragraph are conclusions of law to which a responsive pleading is not required under the rules of procedure and therefore deemed denied.
10. The averments of this paragraph refer to written instrument that speaks for itself and are therefore, deemed denied. By way of further response, the averments of this paragraph are conclusions of law to which a responsive pleading is not required under the rules of procedure and therefore deemed denied. By way of further response, after reasonable investigation, Respondent is without knowledge, information or belief sufficient to form a belief as to the truth of the averment of this paragraph and therefore is deemed denied.
11. After reasonable investigation, Respondent is without knowledge, information or belief

sufficient to form a belief as to the truth of the averment of this paragraph and therefore is deemed denied.

WHEREFORE, Debtor requests that this Honorable Court deny Movant's Motion for Relief from Automatic Stay.

\s\ Michael D. Sayles, Esquire

Michael D. Sayles, Esquire
427 West Cheltenham Avenue
Suite #2
Elkins Park, PA 19027
215.635.2270
midusa1@comcast.net